

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. ) ) Crim. No. 22-10141-WGY  
SEAN O'DONOVAN, )  
Defendant )

## **DISCOVERY PROTECTIVE ORDER**

1. Pursuant to Federal Rule of Criminal Procedure 16(d), the government submits, and the defendant does not at this time contest, that good cause exists for the following protective order in regard to certain confidential discovery in this case, including but not limited to non-party financial and business records.
2. The government will make available copies of discovery materials to defense counsel to comply with the government's discovery obligations. With respect to discovery materials designated as "confidential," defense counsel of record may disclose such materials to their investigators, paralegals, law clerks, and assistants, and to the defendant, only for the purpose of preparing the legal defense in this case.
3. Defense counsel of record may disclose materials designated as "confidential" to any potential witness in this case, provided that any personal identifying information other than the name of an individual (including social security numbers, dates of birth, home addresses, names of minor children, and financial account numbers of third parties) of persons other than the witness have been redacted.
4. In the case of any expert witness hired by defense counsel for the purpose of preparing the legal defense in this case, defense counsel may disclose materials designated as

“confidential” to the expert witness without redaction so long as the expert witness: (a) has signed the attached Agreement To Be Bound By Order, which defense counsel of record shall retain; and (b) destroys all copies of such materials, or returns them to defense counsel of record, at the conclusion of the case.

5. Nothing in this order shall be construed as imposing any discovery obligations on the government or defendants that are different from those imposed by case law, the Federal Rules of Criminal Procedure, and/or the Local Rules.

6. No person receiving discovery materials designated by the government as “confidential” may further disseminate or disclose such materials for any purpose at any time, except as may be agreed upon between defense counsel and the government, or as otherwise ordered by the Court.

IT IS SO ORDERED.

/s/ William G. Young  
Honorable William G. Young  
United States District Judge

Dated: 7/11/2022

**AGREEMENT TO BE BOUND BY ORDER**

I hereby acknowledge that I have read the contents of the above protective order entered in *United States v. Sean O'Donovan*, No. 22-CR-10141-WGY, and have had the terms explained to me. I agree that the order applies to me, that I am bound by its terms, and that I shall comply with its terms.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_